

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

Joy Alford,

Plaintiff,

v.

Renton Collections, a Washington Corporation,  
and John Does I-X , and their marital  
community,

Defendant(s).

) **Case No: C07-1153 RSM**

) **ANSWER TO COUNTER COMPLAINT**  
) **OF RENTON COLLECTIONS**

**COMES NOW**, Plaintiff, by and through her attorney and responds to the Counterclaim raised by  
Defendant Renton Collections.

The Plaintiff reasserts each and every paragraph of the original complaint as though fully  
set forth herein.

**ANSWER TO COUNTERCLAIM:**

The allegations set forth in Paragraph 4 of the Defendant's Counterclaim is DENIED.

**PRAYER FOR RELIEF**

1. Wherefore, the Plaintiff prays that judgment be entered against each and every Defendant:

2. For an award of actual damages pursuant to 15 U.S.C. § 1692k(a)(1) against each and every Defendant and for Plaintiff;
3. For an award of statutory damages of \$1,000.00 pursuant to 15 U.S.C. §1692k(a)(2)(A) against each and every Defendant and for Plaintiff;
4. For an trebling of statutory damages pursuant to RCW 19.86.090 against each and every Defendant and for Plaintiff;
5. For dismissal of the counterclaim asserted by the defendant with prejudice;
6. For an award of costs of litigation and reasonable attorney's fees pursuant to 15 U.S.C. § 1692k(a)(3) and RCW 19.86.090 against each and every Defendant and for Plaintiff

DATED: August 15, 2007



Jay S. Jump, WSBA#28262  
Attorneys for Plaintiff

STATE OF WASHINGTON )  
 ) ss  
COUNTY OF KING )

1. I am a Plaintiff in this civil proceeding.
2. I have read the above-entitled civil Complaint prepared by my attorneys and I believe that all of the facts contained in it are true, to the best of my knowledge, information and belief formed after reasonable inquiry.
3. I believe that this civil Complaint is well grounded in fact and warranted by existing law or by a good faith argument for the extension, modification, or reversal of existing law.
4. I believe that this civil Complaint is not interposed for any improper purpose, such as to harass any Defendant(s), cause unnecessary delay to any Defendant(s), or create a needless increase in the cost of litigation to any Defendant(s), named in the Complaint.
5. I have filed this civil Complaint in good faith and solely for the purposes set forth in it.
6. Each and every exhibit I have provided to my attorneys which has been attached to this Complaint is a true and correct copy of the original.
7. Except for clearly indicated redactions made by my attorneys where appropriate, I have not altered, changed, modified, or fabricated these exhibits, except that some of the attached exhibits may contain some of my own handwritten notations.

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Joy Alford

(seal) \_\_\_\_\_  
Notary Public, Kathryn Jump

FDCPA Complaint – Page 3

1 **Instructions for filing a new case in the Western District of**  
2 **Washington.**

3  
4 (1) Convert Complaint, Civil Cover Sheet, and Summons to  
5 be issued to pdf.

6 (2) Ensure that the files are under the 5 MB limit.

7 (3) Send the email to [newcases.seattle@wawd.uscourts.gov](mailto:newcases.seattle@wawd.uscourts.gov)

8 (4) Advise in the email how you would like to address the  
9 filing fee. We would like a call from the Court to obtain  
10 our credit card information.